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VIA ECF

September 11, 2023

The Honorable John G. Koeltl
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: ***Banco San Juan Internacional, Inc. v. the Federal Reserve Bank of New York and the Board of Governors of the Federal Reserve System, Case No. 1:23-cv-6414 (JGK)***

Dear Judge Koeltl:

On behalf of Defendant the Federal Reserve Bank of New York (“FRBNY”), we write in response to Plaintiff’s letter dated September 7, 2023 to provide our availability for a hearing on the pending preliminary injunction motion (the “Motion”), should the Court deem a hearing to be useful. Defendant FRBNY is available September 20 and 26, as well as October 2-6, 9-10, 12-13, 16, and 18-20.

The FRBNY respectfully requests that this matter be resolved as expeditiously as possible. The FRBNY agreed to keep Plaintiff’s account open through this Court’s resolution of the Motion in exchange for Plaintiff’s agreement to retain a transaction monitor, which is currently in place. This arrangement is unsustainable because it requires the FRBNY to devote substantial resources to reviewing Plaintiff’s account activity and does not adequately mitigate the risk associated with Plaintiff’s account access.

Respectfully submitted,

/s/ Jonathan K. Youngwood

Jonathan K. Youngwood

cc: All Counsel of Record via ECF.